

Education Agents Policy

Alphington Grammar School is governed by the regulations and guidelines of The Education Services for Overseas Students Act (2000) (The 'ESOS Act') and the National Code 2018. Standard 4 of the National Code 2018 requires that the School enters into a written agreement with each Education Agent it engages to formally represent it, and enter and maintain the Education Agent's details in PRISIMS. A full list of our Education Agents can be found on our website.

1. Policy Statement:

- 1.1. Alphington Grammar School's Policy is to ensure that all relationships between the School and Education Agents formally representing the School are governed by written agreements.

2. Procedures:

- 2.1. The School enters and maintains Education Agent details on PRISIMS.
- 2.2. The School provides up to date and accurate information on our Education Agents, and any employees or subcontractors of Education Agents.
- 2.3. Alphington Grammar ensures that Education Agents have appropriate knowledge and understanding of the *Australian International Education and Training Agent Code of Ethics* before engaging their services.
- 2.4. It is ensured by the School that our Education Agents act honestly and in good faith.
- 2.5. The School terminates our relationship with any Education Agent, and any employee or subcontractor of the Education Agent, which engages in dishonest or unethical conduct.
- 2.6. Alphington Grammar School does not accept enrolments of International Students from Education Agents if we know or suspect that the Education Agent is engaging in unethical recruitment processes.
- 2.7. Alphington Grammar maintains evidence of any monitoring or corrective action taken by the School in relation to Education Agents or their employees/subcontractors.
- 2.8. The School provides annual information on its policies and procedures to our Education Agents.
- 2.9. The School provides annual reminders to Education Agents about their role as representatives of the School and their responsibility to engage in honest marketing practices on behalf of the School.
- 2.10. Where changes or updates to the School's policies or procedures relating to International Students at the School occur, Education Agents will be informed as soon as practicable.

3. Agreements:

- 3.1. The Written Agreements between the School and the Education Agents are to be signed by each Education Agent engaged with the School, and will include the following stipulations:
 - the responsibilities of the School, including that the School is responsible at all times for compliance with the ESOS Act and the National Code (2018);
 - the School's requirements of the Education Agent in representing the school as outlined in Standard 4.3 of the National Code (2018);
 - the School's processes for monitoring the activities of the Education Agent in representing the School, and ensuring the Education Agent is giving students accurate and up to date information on the School's services;
 - the corrective action that may be taken by the School if the Education Agent does not comply with its obligations under the written agreement, including providing for corrective action as outlined in Standard 4.4 of the *National Code 2018*;

- the School's grounds for termination of the School's written agreement with the Education Agent, including providing for termination in the circumstances outlined in Standard 4.5;
- the circumstances under which information about the Education Agent may be disclosed by the School and the Commonwealth or state and territory agencies;
- the Education Agent will avoid take reasonable steps to avoid conflicts of interest (see *Section 4* of this policy for more details) with their duties as an Education Agent for Alphington Grammar School;
- the Education Agent will observe appropriate levels of confidentiality and transparency in their dealings with International Students or intending International Students;
- Education Agents will agree to act honestly, in good faith and in the best interests of the International Student;
- Education Agents will have appropriate knowledge and understanding of the international education system in Australia, including the Australian International Education and Training Code of Ethics;

4. Responsibilities:

- 4.1. All staff and Education Agents we engage are formally representing Alphington Grammar School, therefore we require that they ensure they meet the following responsibilities:
- abide by the *National Code 2018* at all times;
 - abide by the Australian International Education and Training Code of Ethics;
 - do not give false or misleading information or advice to International Students or intending International Students in any form or through any mode of communication, as detailed in the School's International Students Marketing Policy;
 - correct any misstatements and/or other mistakes as soon as possible;
 - perform their duties according to the obligations and responsibilities set out in the written agreement; and
 - any misconduct or suspected misconduct by staff or education agents must be reported as soon as possible to the Principal.

5. Conflicts of Interest:

- 5.1. Reasonable steps should be taken by Agents to avoid conflicts of interest wherever possible. The School requires Education Agents to declare conflicts of interest in writing. Conflicts of Interest can include but are not limited to the following:
- when the Agent charges a service fee to both International and the School for the same service;
 - where an Agent has a financial interest in a private education provider; and
 - where an employee of an Education Agent has a personal relationship with an employee of the School.

6. Monitoring and Breaches:

- 6.1. The School monitors its Education Agents regularly and takes corrective actions should the School become aware, or have reason to believe, that the Education Agents have not complied with their responsibilities under the written agreement.
- 6.2. The School monitors its education agents through the following methods:
- regular face-to-face meetings;
 - telephone/teleconference meetings;
 - regular reports on engagements with International Students; and
 - annual visits to Education Agents offices in China and in Melbourne.

- 6.3. In the case of false or misleading recruitment practices, the School will terminate its relationship with an Education Agent, or require the Education Agent to terminate its relationship with the employee or subcontractor who engaged in those practices.
- 6.4. In the case of practices which are not false or misleading but may be confusing to a prospective International Student, the School will provide Education Agents with additional information or targeted training on the School's expectations of the Education Agent.

7. Termination of Agent Agreements:

- 7.1. In accordance with Standard 4.6 of the National Code (2018), The School will not accept students recruited by an Education Agent if it knows or reasonably suspects that the Education Agent is engaging in the following activities:
 - providing migration advice, unless that Education Agent is authorised to do so under the Migration Act 1958 (Cth);
 - engaged in, or previously been engaged in, dishonest recruitment practices, including the deliberate attempt to recruit a student where it clearly conflicts with the obligations of registered providers under Standard 7 (International Student Transfers);
 - facilitating the enrolment of a student who the Education Agent believes will not comply with the conditions of their visa; and
 - using PRISMS to create CoEs for other than bona fide students.